

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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|-------------------------------|---|-----------------------|
| DELTA OIL COMPANY, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | USDC No. 04-12566 PBS |
| |) | |
| HERALD MEDIA, INC. and BOSTON |) | |
| HERALD, INC., |) | |
| Defendants. |) | |

**JOINT MOTION FOR RECONSIDERATION OF DENIAL OF
MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

The Defendants, Herald Media, Inc. and Boston Herald, Inc. (“Defendants”), together with Plaintiff Delta Oil Company, hereby jointly request that the Court reconsider its Order of June 22, 2005, denying an extension of time for the Defendants to answer the Plaintiff’s complaint.

The parties have been engaged in the negotiation of a settlement that will resolve this case entirely, and the parties’ prior requests for extensions of the answer date have reflected the ongoing settlement process. Now, the parties believe that they have reached an agreement acceptable to all parties, and a final version of the settlement documents is currently being circulated for signature. However, because certain representatives of the parties are located outside of the country, there has been a delay in the execution of the final documents. Once these documents are executed and signed copies are exchanged, under the terms of the anticipated settlement no more than thirty (30) days would elapse before the parties would be prepared to file a Stipulation of Dismissal, with prejudice.

Accordingly, in order to ensure that the settlement process may be completed, the Defendants request, with the agreement of the Plaintiff, that the Court reconsider its denial of an extension of the date by which the Defendants must answer. Given the terms of the anticipated

settlement, the Defendants specifically request that the Court extend the answer date to August 1, 2005, by which time the parties should either be in a position to dismiss the case or move forward.

WHEREFORE, the parties respectfully request that this Honorable Court:

- I. Allow the instant Motion; and
- II. Grant such other and further relief as is just and proper.

DELTA OIL COMPANY,
By Its Attorney,

HERALD MEDIA, INC. And
BOSTON HERALD, INC.,
By Their Attorneys,

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Dated: June 29, 2005

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties below by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

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Dated: June 29, 2005

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